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Attorney for Plaintiff JUAN ULLOA

JUAN ULLOA,

Plaintiff,

vs.

NEVADA GOLD MINES, a Delaware
Limited Liability Company,

Defendant.

CASE NO.: 3:21-cv-495-RCJ-CSD

**STIPULATION AND ORDER TO
EXTEND PLAINTIFF'S TIME TO
RESPOND TO DEFENDANT'S MOTION
FOR ENLARGEMENT OF TIME TO
RESPOND TO REQUESTS FOR
ADMISSIONS OR ALTERNATIVELY TO
WITHDRAW ADMISSIONS PURSUANT
TO FRCP 36(b) (ECF NO. 40)**

(FIRST REQUEST)

Defendant, Nevada Gold Mines, LLC ("Defendant" or "NGM"), by and through its counsel of record, ANTHONY HALL and JONATHAN MCGUIRE of SIMONS HALL JOHNSTON, and Plaintiff Juan Ulloa, ("Plaintiff") by and through his counsel of record, J.P. KEMP of KEMP & KEMP, hereby stipulate and agree to extend the deadline for Plaintiff to file his Response to NGM's Motion (ECF No. 40) that seeks an enlargement of time to respond to Requests for Admissions or alternatively to withdraw admissions pursuant to FRCP Rule 36(b). The response, currently due on July 29, 2022, will be extended by two (2) weeks to and including **August 12, 2022**.

The reason for the extension, as Plaintiff's counsel has informed Defense Counsel is that Plaintiff's counsel had another significant briefing deadline due on July 29, 2022 and in the two weeks since Defendant's motion was filed Plaintiff's counsel has been tied up preparing for two party Rule 30(b)(6) depositions and a significant workers' compensation appeal hearing. Also, Plaintiff's counsel was out of the country on vacation until July 20, 2022 when he returned to the office. More time is needed to address the matters set forth in Defendant's motion.

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1 This is the parties first request for an extension of time for Plaintiff to respond to Defendant's
2 motion (ECF No. 40) and is made in good faith and not for the purpose of delay.
3

4 DATED: July 29, 2022

DATED: July 29, 2022

6 KEMP & KEMP

SIMONS HALL JOHNSTON PC

8 /s/ James P. Kemp, Esq.
9 James P. Kemp, Esq.
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ORDER

IT IS SO ORDERED.

Dated: August 1, 2022


UNITED STATES MAGISTRATE JUDGE

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